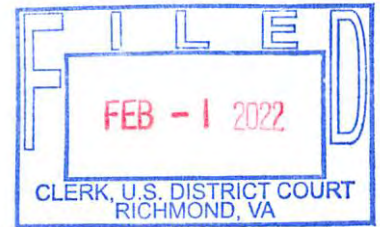


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division



UNITED STATES OF AMERICA

v.

ELHAJ KEITA,

Defendant.

Criminal No. 3:22-CR-011

18 U.S.C. § 875(c)  
Interstate Communication of  
Threat to Injure

INDICTMENT

February 2021 Term - At Richmond, Virginia

THE GRAND JURY CHARGES THAT:

On or about April 20, 2021, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, ELHAJ KEITA, knowingly and willfully did transmit in interstate and foreign commerce from Richmond, Commonwealth of Virginia, to Germany an e-mail communication to service@flixbus.de that contained a threat to injure passengers, customers, and employees of Flix Bus, specifically threatening and promising the deaths of 10 people boarding a Flix Bus.

(In violation of Title 18, United States Code, Section 875(c)).

A TRUE BILL

~~FOR PERSON~~

JESSICA D. ABER  
UNITED STATES ATTORNEY

By:

*Kaitlin G. Cooke*

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Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office